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Attorneys for Plaintiff
AMAZON.COM, INC.
AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

AMAZON.COM, INC., a Delaware corporation,
and AMAZON TECHNOLOGIES, INC., a
Nevada corporation,

Plaintiffs,

v.

UMER WASIM, et al.,

Defendants.

Case No. 4:23-cv-05580-DMR

**DECLARATION OF STEVEN
WILLIAMS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
EXPEDITED DISCOVERY**

I, Steven Williams, declare as follows:

1. I am over the age of 18 and am competent to testify on the matters set forth herein. I make the following declaration based on personal knowledge.

Qualifications and Personal Knowledge

2. I am an investigator at Davis Wright Tremaine, LLP. I have over twenty years of experience as an investigator, which includes investigating malicious online conduct like the

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1 scheme described in the Complaint that was perpetrated by the defendants. I have personal
2 knowledge of the facts described below, and am competent to make this declaration.

3 3. Counsel for Amazon.com, Inc. ("Amazon") at Davis Wright Tremaine, LLP
4 instructed me to investigate certain online conduct perpetrated by currently unknown defendants
5 ("Defendants").

6 **Web Design Stop; webdesignstop.com**

7 4. I have reviewed an Amended Complaint filed in relation to Uniform Domain
8 Name Dispute Resolution Policy ("UDRP") Decision 2305002043019, which lists the registrant
9 for amazondirectpublisher.com, amazonpublishingfirm.com, amazonkdppublishingpros.com,
10 amazonpublishingoffice.com, and amzprofs.com as "Web / Design Stop", with a contact email
11 address of support@webdesignstop.com. Web / Design Stop's address is listed as being 2880
12 Zanker Road North, Suite 203, San Jose, CA 95134, United States, and its phone number is
13 listed as being +1 4082167976.

14 5. I have investigated this domain, webdesignstop.com, and viewed an active
15 website at the domain on 11/13/23. At the time of the visit, the website host was identified as
16 being Siteground.net.

17 6. The domain was registered on 6/17/21. The registrar for this website is
18 Namecheap, Inc., and the registrant information is "Redacted for Privacy". The registrant
19 organization was Withheld for Privacy ehf.

20 7. On 11/13/23, the website advertised a contact phone number of 408-216-8766, a
21 physical address of 2880 Zanker Road North, Suite 203, San Jose, CA 95134, and a contact
22 email of sales@webdesignstop.com.

23 8. I investigated phone number 408-216-8766, and confirmed that it is administered
24 by the provider Vonage Holdings Corp.

25 9. I investigated phone number 408-216-7976, provided as registrant contact
26 information for registrant Web/Design Stop, and confirmed that it is administered by the
27 provider Vonage Holdings Corp.

28 10. I investigated phone number 408-785-0278, associated with the "Call Us" radio

1 button located in the top right-hand corner of www.webdesignstop.com, and confirmed that it is
 2 administered by the provider Level 3 Communications, whose parent company is Lumen
 3 Technologies, Inc.

4 11. I investigated the above-identified address at 2880 Zanker Road North in San
 5 Jose, and confirmed that it is the location of a virtual office provider Regus, which is owned by
 6 IWG PLC group.

7 12. The website offers a chat capability. According to the website's source code, this
 8 feature is supported by Zendesk, Inc.

9 13. According to the page source code, the website also uses Google Tags. I know
 10 that Google Tags can be deployed to collect data on webpages. Google Tags are managed using
 11 a Google Tag Manager account, provided by Google, LLC.
 12 (<https://support.google.com/tagmanager/answer/11994839?hl=en#:~:text=The%20Google%20tag%20lets%20you,of%20your%20website%20and%20ads.>).
 13

14 14. I have searched online sources, including the California's Secretary of States's
 15 website and the National Corporation Directory, and was not able to obtain results for the entity
 16 names "Web Design Stop", or Web/Design Stop".

17 15. I reviewed preservations of the websites at the following domains;
 18 amazonpublishingoffice.com ("Website 1"); amazondirectpublisher.com ("Website 2");
 19 amazonkdppublishingpros.com ("Website 3"); amazonpublishingfirm.com ("Website 4"); and
 20 amzprofs.com ("Website 5").

21 16. Website 2 and Website 5 offered a chat capability. According to the websites'
 22 archived source code, this feature was supported by Zendesk, Inc. According to Website 5's
 23 archived source code, the website also used Google Tags.

24 17. I investigated phone numbers advertised on these websites and confirmed that
 25 they are administered by the indicated providers below;

26 408-440-5333 (Onvoy, LLC, a Sinch Company)

27 408-600-0309 (Level 3 Communications, whose parent company is Lumen

28 Technologies, Inc.)

1 408-728-9333 (Level 3 Communications, whose parent company is Lumen
2 Technologies, Inc.)

3 408-689-7746 (Level 3 Communications, whose parent company is Lumen
4 Technologies, Inc.)

5 18. I investigated the physical addresses on these websites, and confirmed that they
6 are locations of the mail service or virtual office providers below;

7 123 E San Carlos St., San Jose, CA 95112 (Annex Brands, Inc.)

8 6017 Snell Ave, San Jose, CA 95123 (Sustainable 2 U Inc.)

9 116 E Live Oak Ave., Arcadia, CA 91006 (TT Post Services Inc.)

10 **TMAZ Services Digital**

11 19. I reviewed correspondence from the company Stripe, Inc., declining a chargeback
12 in the amount of \$4,000, which indicated a merchant name of "TMAZServicesDigital", merchant
13 website of "webdesignstop.com", transaction information, a customer name for the individual
14 identified in the Complaint as Victim 1, and communications from an unidentified individual
15 representing the brand "Amazon Publishing Office" and referencing the web address
16 www.amazonpublishingoffice.com.

17 **Atlas Technologies**

18 20. I have reviewed an Amended Complaint filed in relation to Uniform Domain
19 Name Dispute Resolution Policy ("UDRP") Decision 2305002043019, which lists the registrant
20 for amazonproinc.com as "Atlas Technologies", with a contact email address of
21 atlastechnologiespvt@gmail.com. Atlas Technologies' address is listed as being 1117 Lattimore
22 Dr, Clermont, FL 34711, USA Lattimore, Florida 34711 PK, and its phone number is listed as
23 being +92.03209299214.

24 21. I know that Gmail is a free email service provided by Google, LLC.

25 22. I have searched online sources, including the website for the Securities &
26 Exchange Commission of Pakistan, and was unable to obtain results for the entity name "Atlas
27 Technologies". I also searched the Florida Department of State, Division of Corporations
28 website, as well as the National Corporation Directory, and was unable to locate any results for

1 an entity named “Atlas Technologies”, that had any identifiers in common with those provided
2 for the registrant Atlas Technologies.

3 **Website 6: amazondigitalpublishing.com**

4 23. I have investigated this domain using DomainTools, and viewed a preservation of
5 a website from 7/22/22 that was active at this domain. At the time of the preservation, the
6 website host was identified as being Namecheaphosting.com.

7 24. The domain was registered on 7/5/22. The registrar for this website at the time
8 was Namecheap, Inc., and the registrant information provided was “Redacted for Privacy”. The
9 registrant organization was Withheld for Privacy ehf.

10 25. On 7/22/22, the website advertised a contact phone number of 855-416-4096, a
11 physical address of 5201 Great America Pkwy, Unit 320, Santa Clara, CA 95054, and a contact
12 email address of info@amazondigitalpublishing.com.

13 26. I investigated this phone number, and confirmed that it is administered by the
14 provider DIALPAD, INC.

15 27. I investigated this address, and confirmed that it is the location of a virtual office
16 provider, Regus, which is owned by IWG PLC group.

17 **Website 8: amazondigitalpublisher.com**

18 28. I have investigated this domain using DomainTools, and viewed a preservation of
19 a website from 9/20/22 that was active at this domain. At the time of the preservation, the
20 website host was identified as being Namecheaphosting.com.

21 29. The domain was registered on 9/8/22. The registrar for this website at the time
22 was Namecheap, Inc., and the registrant information provided was “Redacted for Privacy”. The
23 registrant organization was Withheld for Privacy ehf.

24 30. On 9/20/22, the website advertised a contact phone number of 855-416-4096, a
25 partial physical address of 5201 Great America Pkw, Clara, CA 95054, and contact email
26 addresses of info@amazondigitalPublisher.com and compliance@amazondigitalpublisher.com.

27 **Website 9: amazondigitalpublishers.com**

28 31. I have investigated this domain using DomainTools, and viewed a preservation of

1 a website from 9/19/22 that was active at this domain. At the time of the preservation, the
2 website host was identified as being Namecheaphosting.com.

3 32. The domain was registered on 9/7/22. The registrar for this website at the time
4 was Namecheap, Inc., and the registrant information provided was "Redacted for Privacy". The
5 registrant organization was Withheld for Privacy ehf.

6 33. On 9/19/22, the website advertised a contact phone number of 855-287-7372, a
7 physical address of 5201 Great America Pkwy, Unit 320, Santa Clara, CA 95054, and a contact
8 email address of info@amazondigitalpublishers.com.

9 34. I investigated this phone number, and confirmed that it is administered by the
10 provider DIALPAD, INC.

11 **Website 10; amazonpublishingsol.com**

12 35. I have investigated this domain using DomainTools, and viewed a preservation of
13 a website from 9/14/22 that was active at this domain. At the time of the preservation, the
14 website host was identified as being Namecheaphosting.com.

15 36. The domain was registered on 8/22/22. The registrar for this website at the time
16 was Namecheap, Inc., and the registrant information provided was "Redacted for Privacy". The
17 registrant organization was Withheld for Privacy ehf.

18 37. On 9/14/22, the website advertised a contact phone number of 855-408-6467, a
19 physical address of 5201 Great America Pkwy, Unit 320, Santa Clara, CA 95054, and a contact
20 email address of info@amazonpublishingsol.com.

21 38. I investigated this phone number, and confirmed that it is administered by the
22 provider DIALPAD, INC.

23 **Website 19; amzdigitalpro.com**

24 39. I have investigated this domain using DomainTools, and viewed a preservation of
25 a website from 8/1/23 that was active at this domain. At the time of the preservation, the website
26 host was identified as being Dns-parking.com.

27 40. The domain was registered on 5/9/23. The registrar for this website at the time
28 was GoDaddy.com, LLC., and the registrant information provided was "Registration Private".

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1 The registrant organization was Domains by Proxy, LLC.

2 41. The website offered a chat capability. According to the website's archived source
3 code, this feature was supported by Zendesk, Inc. According to the archived website source code,
4 the website also used Google tags.

5 42. On 8/1/23, the website advertised a contact phone number of 877-313-0795, a
6 physical address of 80 Broad Street, 5th Floor, New York City, NY 10004, and a contact email
7 address of info@amazondigitalpro.com.

8 43. I investigated this phone number, and confirmed that it is administered by the
9 provider TELNYX, LLC.

10 44. I investigated this address, and confirmed that it is the location of a virtual office
11 provider, Regus, which is owned by IWG PLC group.

12 **Website 22; amazonkdpublishing.com**

13 45. I have investigated this domain using DomainTools, and viewed a preservation of
14 a website from 3/1/23 that was active at this domain. At the time of the preservation, the website
15 host was identified as being Namecheaphosting.com.

16 46. The domain was registered on 2/28/23. The registrar for this website at the time
17 was Namecheap, Inc., and the registrant information provided was "Redacted for Privacy". The
18 registrant organization was Withheld for Privacy ehf.

19 47. The website offered a chat capability. According to website's source code, this
20 feature was supported by Zendesk, Inc.

21 48. On 3/1/23, the website advertised a contact phone number of 844-533-5766, and a
22 physical address of 5670 Wilshire Boulevard Mid-Wilshire, Suite 1800, Los Angeles, CA
23 90036.

24 49. I investigated this phone number, and confirmed that it is administered by the
25 provider Bandwidth, Inc.

26 50. I investigated this address, and confirmed that it is the location of a virtual office
27 provider, Regus, which is owned by IWG PLC group.

28 **Website 23; amazonkdppublication.com**

1 51. I have investigated this domain using DomainTools, and viewed a preservation of
2 a website from 8/3/23 that was active at this domain. At the time of the preservation, the website
3 host was identified as being Domaincontrol.com.

4 52. The domain was registered on 5/24/23. The registrar for this website at the time
5 was GoDaddy.com, LLC, and the registrant information provided was "Registration Private".
6 The registrant organization was Domains by Proxy, LLC.

7 53. The website offered a chat capability. According to website's archived source
8 code, this feature was supported by Zendesk, Inc. According to the archived website source code,
9 the website also used Google tags.

10 54. On 8/3/23, the website advertised a contact phone number of 888-531-1665, and a
11 physical address of One Pierrepont Plaza, Brooklyn, NY 11201.

12 55. I investigated this phone number, and confirmed that it is administered by the
13 provider TELNYX, LLC.

14 56. I investigated this address, and confirmed that it is the location of a virtual office
15 provider, Regus, which is owned by IWG PLC group.

16 **Website 25; amazonprofessionalpublishers.com**

17 57. I have investigated this domain, www.amazonprofessionalpublishers.com, and
18 viewed an active website at the domain on 11/13/23. At the time of the visit, the website host
19 was identified as being Trademarkcanon.com.

20 58. The domain was registered on 3/27/23. The registrar for this website is
21 Namecheap, Inc., and the registrant information is "Redacted for Privacy". The registrant
22 organization was Withheld for Privacy ehf.

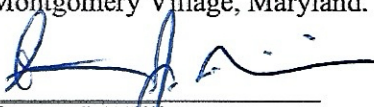
23 59. On November 13, 2023, the website advertised a contact phone number of 855-
24 408-6467, a physical address of 5201 Great America Pkwy, Unit 320, Santa Clara, CA 95054,
25 and a contact email of info@amazonprofessionalpublishers.com.

26 60. The website offers a chat capability. According to the website's source code, this
27 feature is supported by Zendesk, Inc. According to the page source code, the website also uses
28 Google tags.

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Executed this 4th day of December, 2023 in Montgomery Village, Maryland.

By: 
Steven J. Williams

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